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Arnold Schwarzenegger
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July 27, 2010

Dr. Teklewold Ayalew
California Environmental Protection Agency
Los Angeles Regional Water Quality Control Board
320 West 4th Street Ste 200
Los Angeles California 90013

COMMENTS ON THE TENTATIVE CLEANUP AND ABATEMENT ORDER R4-2010-OOXX FOR FORMER KAST PROPERTY, CARSON, CALIFORNIA

Dear Dr. Ayalew:

Thank you for the opportunity to comment on the tentative CAO for the subject property. DTSC has the following comments and suggestions:

Page 2, Site History, Finding number 6. This paragraph should also indicate how the crude oil was transferred into the oil storage reservoirs.

Page 3, Evidence of Contamination and Basis for Order. Finding number 8. Revisions to paragraph a. should be considered for clarification as follows:

"An environmental investigation of the former Turco Products Facility (TPF) was initiated in 2007 under the regulatory oversight of the Department of Toxic Substances Control (DTSC). Soil gas and groundwater was investigated in areas directly west of the Site and at locations in the northwestern portion of the Site. The DTSC-required investigation detected petroleum hydrocarbons, benzene, toluene, and chlorinated solvents in soil, soil vapor and groundwater. A multi-depth soil vapor survey, which included soil vapor sampling on the Site at locations coincident with the former oil reservoir footprints, detected benzene up to concentrations of 150 micrograms per liter (µg/l). Benzene was detected in groundwater beneath the northeast corner of the former TPF at concentrations of 1,800 µg/l (in MW-8) and under the northern portion of the Site at concentrations of 1,900 µg/l (in MW-16). Additionally, as the TPF investigation progressed under the Site, black, oily soil was encountered. On March 11, 2008, the DTSC transmitted data and a request to the Regional Board for regulatory oversight of the former Site."

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Page 3, Evidence of Contamination and Basis for Order. Finding number 8 b. The author and title of the referenced report should be included.

Page 4, d. I and II. Since item d. mentions both soil and soil vapor sampling, items I and II should specify that they are discussing concentrations detected in soil.

Page 5, 10 b. III, notes that the evidence for the CAO was based in part on the subsurface drainage study for the Site reservoirs, but it is unclear how this report may have been incorporated as evidence in the findings.

Page 7, item 12. Two policies are listed for consideration of cleanup goals, but in addition, the top of page 10 also notes that groundwater cleanup goals shall not exceed California Maximum Contaminant Levels or Action Levels for drinking water. There appears to be contradiction in these two discussions of cleanup goals and this should be clarified further in the CAO. Additionally, DTSC suggests that groundwater contamination from the Fletcher Oil, Turco, and Kast properties has comeingled; therefore, consistent cleanup goals for all three properties should be established, and groundwater remediation efforts at these three sites should be closely coordinated by all concerned agencies. Reference to such coordination should be included in the CAO.

Page 8 Item 2. Include another item that indicates that DTSC or an appointed consultant for TPF shall be allowed to collect split samples on request.

Page 9, item d. Include acknowledgment that petroleum hydrocarbon impacts from the Site may have migrated onto or under the TPF and these impacts should also be addressed by Shell.

Page 10, d, II Include item iii. that coordination with DTSC will be conducted for the groundwater and soil vapor remediation where those plumes are comeingled in the northwestern area of the Site.

Table 4. Include the submittals of Quarterly and Annual reports in the schedule.

If you have any questions about this letter, please call me at (714) 484-5316.

Sincerely,



Robert Romero
Hazardous Substances Engineer
Office of Engineering and Special Projects

cc: See next page

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